

Christian Foote (SBN 240919)  
**Duane Morris LLP**  
Spear Tower  
One Market Plaza, Suite 2200  
San Francisco, CA 94105-1127  
Telephone: +1 415 957 3000  
Fax: +1 415 957 3001  
E-mail: cpfoote@duanemorris.com

Attorneys for Defendant  
CAPITAL ONE, N.A.

Mark F. Anderson (SBN 44787)  
**Anderson, Ogilvie & Brewer LLP**  
235 Montgomery Street, Suite 914  
San Francisco, CA 94104  
Direct dial 415.651.1951  
Fax 415.500.8300  
E-mail: mark@aoblawyers.com

Attorneys for Plaintiff  
IRINA VERDIYAN

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND COURTHOUSE**

IRINA V. VERDIYAN,  
  
Plaintiff,

v.

CAPITAL ONE, N.A.; TRANS UNION LLC;  
EQUIFAX INFORMATION SERVICES LLC;  
AND EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendants.

Case No.: 4:12-cv-01841-CW

**STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING FACT AND  
EXPERT DISCOVERY CUT OFF**

Complaint Filed: April 12, 2012  
Trial Date: September 9, 2013

**STIPULATION**

WHEREAS, by virtue of its Case Management Order dated July 25, 2012, the Court set the fact and expert discovery cut-off in this case for March 1, 2013;

WHEREAS, Capital One and Verdiyan are attempting to negotiate a settlement in this case;

WHEREAS, the parties have noticed multiple depositions and have propounded written discovery, and completing this discovery will require significant financial expenditure;

WHEREAS, incurring these expenditures potentially could act as an impediment to the parties' ability to reach a settlement, and so therefore the parties wish to hold these costs in abeyance while they continue to explore the possibility of a settlement;

IT IS STIPULATED that the fact and expert discovery cut-off in this action is continued from March 1 to April 1, 2013, with all other deadlines set forth in the Court's Case Management Order of July 25, 2012, to remain in effect.

Dated: February 13, 2013

**ANDERSON OGILVIE & BREWER LLP**

By: /s/ Mark F. Anderson

Mark F. Anderson  
Attorneys for Plaintiff  
IRINA VERDIYAN

Dated: February 13, 2013

**DUANE MORRIS LLP**

By: /s/ Christian Foote

Christian Foote  
Attorneys for Defendant  
CAPITAL ONE, N.A.

~~proposed~~ ORDER

Pursuant to the parties' Stipulation, and good-cause appearing therefore, the parties shall complete all fact and expert discovery by April 1, 2013. All other deadlines and dates set forth in the Court's Case Management Order dated July 25, 2012, shall remain in effect.

IT IS SO ORDERED.

Date: 2/15/2013

A handwritten signature in blue ink, appearing to read 'Claudia Wilken', is written over a horizontal line.

Hon. Claudia Wilken  
Chief Judge of the District Court